

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,)

Plaintiff,)

v.)

MUHAMMED DYE,)

aka RED,)

KENNETH AGEE,)

aka BHEAD,)

PERRY AUSTIN,)

aka TWIN,)

KEVIN BALLARD,)

aka KEV,)

JAMES BRASWELL,)

aka JAY,)

aka TONE,)

HAROLD CAMERON,)

aka TY,)

TREVOR CAMPBELL,)

aka BLACK,)

CORDALE DANIELS,)

aka MC,)

KEVIN DANIELS,)

aka KILLER KEV,)

CHRISTOPHER ELLIOT,)

aka CANNON,)

aka CAN)

BRANDON GEER,)

aka TYSON,)

TORRENCE GILLIS,)

aka TCHEESY,)

ABDUL GLOVER,)

aka ABDUL,)

RAYMOND HARRIS,)

aka HAZE,)

LAMONT HEARD,)

aka BIG HEARD,)

I N D I C T M E N T

CASE NO. _____

21 U.S.C. §§ 841(a)(1),

(b)(1)(A), (b)(1)(B),

(b)(1)(C); § 846;

§856(a)(2); 18 U.S.C.

§2; 18 U.S.C. §924(c)

aka BILL,)
 JEREMIAH JACKSON,)
 aka MEYER LANSKY,)
 aka EL,)
 ANTHONY KARBAN,)
 aka TONE,)
 JEFFREY LEE,)
 aka BIG JEFF,)
 JERMAINE LEE,)
 aka SMURF,)
 aka J,)
 MARCYL KELLY,)
 MICHAEL MAY,)
 aka DIESEL,)
 aka D,)
 LASHAWN MONCRIEF,)
 aka SHAWN,)
 LEONARD MONCRIEF,)
 aka BOOMER,)
 DARNELL NESBIT,)
 aka DNASTY,)
 aka D,)
 KALEEF REED,)
 aka KBURPO,)
 aka KHALEEF REID,)
 aka K,)
 CHRISTOPHER WILEY,)
 aka WILEY,)
 aka PEE,)
 ANTHONY WILSON,)
 aka ANTHONY EVANS,)
 aka PAULY,)

 OMAR WILSON,)
 aka OMAR,)
 aka O,)
)
 Defendants.)

COUNT 1

The Grand Jury charges:

Beginning at least as early as May, 2005, and continuing
 through June, 2006, the exact dates to the Grand Jury unknown,
 in the Northern District of Ohio, Eastern Division, and

elsewhere, MUHAMMED DYE, aka RED, KENNETH AGEE, aka BHEAD, PERRY AUSTIN, aka TWIN, KEVIN BALLARD, aka KEV, JAMES BRASWELL, aka JAY, aka TONE, HAROLD CAMERON, aka TY, TREVOR CAMPBELL, aka BLACK, CORDELL DANIELS, aka MC, KEVIN DANIELS, aka KILLER KEV, CHRISTOPHER ELLIOT, aka CANNON, aka CAN, BRANDON GEER, aka TYSON, TORRENCE GILLIS, aka TCHEESY, ABDUL GLOVER, aka ABDUL, RAYMOND HARRIS, aka HAZE, LAMONT HEARD, aka BIG HEARD, aka BILL, JEREMIAH JACKSON, aka MEYER LANSKY, aka EL, ANTHONY KARBAN, aka TONE, JEFFREY LEE, aka BIG JEFF, JERMAINE LEE, aka SMURF, aka J, MARCYL KELLY, MICHAEL MAY, aka DIESEL, aka D, LASHAWN MONCRIEF, aka SHAWN, LEONARD MONCRIEF, aka BOOMER, DARNELL NESBIT, aka DNASTY, aka D, KALEEF REED, aka KBURPO, aka KHALEEF REID, aka K, CHRISTOPHER WILEY, aka WILEY, aka PEE, ANTHONY WILSON, aka ANTHONY EVANS, aka PAULY, and OMAR WILSON, aka OMAR, aka O, the defendants herein, did unlawfully, knowingly, and intentionally combine, conspire, confederate, and agree together and with each other, and with diverse others known and unknown to the Grand Jury, to possess with the intent to distribute and to distribute 50 grams or more of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

MANNER AND MEANS OF THE CONSPIRACY

A. It was part of the conspiracy that some conspiracy members would identify some members of the conspiracy as "Dirty

Thirties" and/or "D-30's". The "Dirty Thirties" ("D-30's") identified themselves by tattoos, graffiti, and hand signals.

B. It was part of the conspiracy that conspiracy members would purchase quantities of cocaine base ("crack") from MUHAMMED DYE, aka RED, JERMAINE LEE, aka SMURF, aka J, KEVIN BALLARD, aka KEV, and JAMES BRASWELL, aka JAY, aka TONE .

C. It was further part of the conspiracy that conspiracy members would sell quantities of cocaine base ("crack") to other members of the conspiracy, other drug dealers, and drug users, in the vicinity of the Cedar Estates Housing Project, located between East 22nd and East 30th Streets, Cleveland, Ohio.

D. It was further part of the conspiracy that conspiracy members would receive and pass messages (sometimes using push-to-talk phones) among each other to facilitate drug transactions.

E. It was further part of the conspiracy that conspiracy members would direct buyers to other members of the conspiracy to conduct the drug transactions requested by the buyer.

F. It was further part of the conspiracy that members of the conspiracy would provide each other with advice and protection from law enforcement surveillance and rival drug sellers.

G. It was further part of the conspiracy that conspiracy members would combine ("pool") their drugs to engage in drug sales of greater quantities.

H. It was further part of the conspiracy that juveniles were recruited by conspiracy members to assist conspiracy members in drug transactions.

I. It was further part of the conspiracy that conspiracy members engaged in violence and/or threats of violence to facilitate the goals of the conspiracy.

OVERT ACTS

In furtherance thereof, and to effect the objectives of the conspiracy, the defendants and others performed overt acts in the Northern District of Ohio, including but not limited to the following:

1. On August 16, 2005, JERMAINE LEE, aka SMURF, aka J, and ABDUL GLOVER, aka ABDUL, sold 1.32 grams of cocaine base ("crack") to a person cooperating with law enforcement (herein after "CW") in the vicinity of the Cedar Estates Housing Project, Cleveland, Ohio.

2. On August 17, 2005, TREVOR CAMPBELL, aka BLACK, sold 7.97 grams of cocaine base ("crack") to a CW in the vicinity of the Cedar Estates Housing Project, Cleveland, Ohio.

3. On August 19, 2005, CHRISTOPHER WILEY, aka WILEY, aka PEE, sold 2.79 grams of cocaine base ("crack") to a CW in the vicinity of the Cedar Estates Housing Project, Cleveland, Ohio.

4. On August 24, 2005, BRANDON GEER, aka TYSON, and MICHAEL MAY, aka DIESEL, aka D, sold 2.89 grams of cocaine base ("crack") to a CW in the vicinity of the Cedar Estates Housing Project, Cleveland, Ohio.

5. On August 30, 2005, ANTHONY WILSON, aka ANTHONY EVANS, aka PAULY, possessed a firearm in furtherance of a drug trafficking crime in the vicinity of the Cedar Estates Housing Project, Cleveland, Ohio.

6. On October 11, 2005, MUHAMMED DYE, aka RED, sold 6.70 grams of cocaine base ("crack") to a CW in the vicinity of the Cedar Estates Housing Project, Cleveland, Ohio.

7. On October 20, 2005, CHRISTOPHER ELLIOT, aka CANNON, aka CAN, sold 5.19 grams of cocaine base ("crack") to a CW in the vicinity of the Cedar Estates Housing Project, Cleveland, Ohio.

8. On October 21, 2005, KEVIN BALLARD, aka KEV, and HAROLD CAMERON, aka TY, sold 9.16 grams of cocaine base ("crack") to a CW in the vicinity of the Cedar Estates Housing Project, Cleveland, Ohio.

9. On October 25, 2005, KEVIN BALLARD, aka KEV, and HAROLD CAMERON, aka TY, sold 11.79 grams of cocaine base ("crack") to a CW in the vicinity of the Cedar Estates Housing Project, Cleveland, Ohio.

10. On October 26, 2005, KEVIN BALLARD, aka KEV, sold 11.93 grams of cocaine base ("crack") to a CW in the vicinity of the Cedar Estates Housing Project, Cleveland, Ohio.

11. On October 31, 2005, CHRISTOPHER ELLIOT, aka CANNON, aka CAN, and ANTHONY KARBAN, aka TONE, sold 8.20 grams of cocaine base ("crack") to a CW in the vicinity of the Cedar Estates Housing Project, Cleveland, Ohio.

12. On November 3, 2005, ANTHONY KARBAN, aka TONE, sold 9.25 grams of cocaine base ("crack") to a CW in the vicinity of the Cedar Estates Housing Project, Cleveland, Ohio.

13. On November 7, 2005, CHRISTOPHER WILEY, aka WILEY, aka PEE, sold 12.10 grams of cocaine base ("crack") to a CW in the vicinity of the Cedar Estates Housing Project, Cleveland, Ohio.

14. On November 8, 2005, KALEEF REED, aka KBURPO, aka KHALEEF REID, aka K, and OMAR WILSON, aka OMAR, aka O, sold 2.62 grams of cocaine base ("crack") to a CW in the vicinity of the Cedar Estates Housing Project, Cleveland, Ohio.

15. On November 8, 2005, KALEEF REED, aka KBURPO, aka KHALEEF REID, aka K, and OMAR WILSON, aka OMAR, aka O, sold 3.96 grams of cocaine base ("crack") to a CW in the vicinity of the Cedar Estates Housing Project, Cleveland, Ohio.

16. On November 16, 2005, ABDUL GLOVER, aka ABDUL, sold 1.66 grams of cocaine base ("crack") to a CW in the vicinity of the Cedar Estates Housing Project, Cleveland, Ohio.

17. On November 23, 2005, KEVIN DANIELS, aka KILLER KEV, and ANTHONY WILSON, aka ANTHONY EVANS, aka PAULY, sold 10.17 grams of cocaine base ("crack") to a CW in the vicinity of the Cedar Estates Housing Project, Cleveland, Ohio.

18. On November 23, 2005, MARCYL KELLY permitted her residence, located at the Cedar Estates Housing Project, Cleveland, Ohio, to be used to distribute cocaine base ("crack").

19. On November 29, 2005, ANTHONY WILSON, aka ANTHONY EVANS, aka PAULY, sold 22.19 grams of cocaine base ("crack") to a CW in the vicinity of the Cedar Estates Housing Project, Cleveland, Ohio.

20. On November 29, 2005, MARCYL KELLY permitted her residence, located at the Cedar Estates Housing Project, Cleveland, Ohio, to be used to distribute cocaine base ("crack").

21. On November 30, 2005, JAMES BRASWELL, aka JAY, aka TONE, sold 1.49 grams of cocaine base ("crack") to a CW in the vicinity of the Cedar Estates Housing Project, Cleveland, Ohio.

22. On December 1, 2005, CORDALE DANIELS, aka MC, sold 1.01 grams of cocaine base ("crack") to a CW in the vicinity of the Cedar Estates Housing Project, Cleveland, Ohio.

23. On December 2, 2005, KEVIN BALLARD, aka KEV, and CORDALE DANIELS, aka MC, sold 9.75 grams of cocaine base ("crack") to a CW in the vicinity of the Cedar Estates Housing Project, Cleveland, Ohio.

24. On December 13, 2005, JAMES BRASWELL, aka JAY, aka TONE, sold 12.74 grams of cocaine base ("crack") to a CW in the vicinity of 3333 Detroit Avenue, Cleveland, Ohio.

25. On December 13, 2005, KEVIN DANIELS, aka KILLER KEV, JEFFREY LEE, aka BIG JEFF, and JERMAINE LEE, aka SMURF, aka J, sold 6.80 grams of cocaine base ("crack") to a CW in the vicinity of the Cedar Estates Housing Project, Cleveland, Ohio.

26. On December 15, 2005, JEFFREY LEE, aka BIG JEFF, sold 9.49 grams of cocaine base ("crack") to a CW in the vicinity of the Cedar Estates Housing Project, Cleveland, Ohio.

27. On December 16, 2005, JEFFREY LEE, aka BIG JEFF, and JERMAINE LEE, aka SMURF, aka J, sold 12.42 grams of cocaine base ("crack") to a CW in the vicinity of the Cedar Estates Housing Project, Cleveland, Ohio.

28. On December 29, 2005, LAMONT HEARD, aka BIG HEARD, aka BILL, and CORDALE DANIELS, aka MC, sold 7.23 grams of cocaine base ("crack") to a CW in the vicinity of the Cedar Estates Housing Project, Cleveland, Ohio.

29. On January 5, 2006, MUHAMMED DYE, aka RED, sold 32.87 grams of cocaine base ("crack") to a CW in the vicinity of the Cedar Estates Housing Project, Cleveland, Ohio.

30. On January 9, 2006, MUHAMMED DYE, aka RED, sold 6.15 grams of cocaine base ("crack") to a CW in the vicinity of the Cedar Estates Housing Project, Cleveland, Ohio.

31. On January 25, 2006, LASHAWN MONCRIEF, aka SHAWN, possessed with the intent to distribute 2.87 grams of cocaine base ("crack").

32. On February 13, 2006, JEREMIAH JACKSON, aka MEYER LANSKY, aka EL, sold 0.48 grams of cocaine base ("crack") to a CW in the vicinity of the Cedar Estates Housing Project, Cleveland, Ohio.

33. On February 14, 2006, PERRY AUSTIN, aka TWIN, and RAYMOND HARRIS, aka HAZE, sold 0.63 grams of cocaine base

("crack") to a CW in the vicinity of the Cedar Estates Housing Project, Cleveland, Ohio.

34. On February 15, 2006, DARNELL NESBIT, aka DNASTY, aka D, sold 3.68 grams of cocaine base ("crack") to a CW in the vicinity of the Cedar Estates Housing Project, Cleveland, Ohio.

35. On February 23, 2006, JEREMIAH JACKSON, aka MEYER LANSKY, sold 2.76 grams of cocaine base ("crack") to a CW in the vicinity of the Cedar Estates Housing Project, Cleveland, Ohio.

36. On March 2, 2006, DARNELL NESBIT, aka DNASTY, aka D, sold 2.60 grams of cocaine base ("crack") to a CW in the vicinity of the Cedar Estates Housing Project, Cleveland, Ohio.

37. On March 2, 2006, KENNETH AGEE, aka BHEAD, MUHAMMED DYE, aka RED, and LAMONT HEARD, aka BIG HEARD, aka BILL, sold 8.21 grams of cocaine base ("crack") to a CW in the vicinity of the Cedar Estates Housing Project, Cleveland, Ohio.

38. On March 15, 2006, RAYMOND HARRIS, aka HAZE, sold 3.10 grams of cocaine base ("crack") to a CW in the vicinity of the Cedar Estates Housing Project, Cleveland, Ohio.

39. On March 24, 2006, RAYMOND HARRIS, aka HAZE, sold 5.60 grams of cocaine base ("crack") to a CW in the vicinity of the Cedar Estates Housing Project, Cleveland, Ohio.

40. On March 27, 2006, JEREMIAH JACKSON, aka MEYER LANSKY, aka EL, sold 5.98 grams of cocaine base ("crack") to a CW in the vicinity of the Cedar Estates Housing Project, Cleveland, Ohio.

41. On April 11, 2006, KEVIN DANIELS, aka KILLER KEV, sold 0.65 grams of cocaine base ("crack") to a CW in the vicinity of the Cedar Estates Housing Project, Cleveland, Ohio.

42. On April 27, 2006, DARNELL NESBIT, aka DNASTY, aka D, sold 1.46 grams of cocaine base ("crack") to a CW in the vicinity of the Cedar Estates Housing Project, Cleveland, Ohio.

43. On May 5, 2006, LEONARD MONCRIEF, aka BOOMER, sold 1.14 grams of cocaine base ("crack") to a CW in the vicinity of the Cedar Estates Housing Project, Cleveland, Ohio.

44. On May 9, 2006, HAROLD CAMERON, and TY, and MUHAMMED DYE, aka RED, sold 16.79 grams of cocaine base ("crack") to a CW in the vicinity of the Cedar Estates Housing Project, Cleveland, Ohio.

45. On May 9, 2006, TORRENCE GILLIS, aka TCHEESY, possessed with the intent to distribute approximately 4.12 grams of cocaine base ("crack") in the vicinity of the Cedar Estates Housing Project, Cleveland, Ohio.

46. On May 9, 2005, PERRY AUSTIN, aka TWIN, possessed with the intent to distribute approximately 2.28 grams of cocaine base ("crack") in the vicinity of the Cedar Estates Housing Project, Cleveland, Ohio.

47. On May 9, 2005, PERRY AUSTIN, aka TWIN, sold approximately 0.14 grams of cocaine base ("crack") to a CW in the vicinity of the Cedar Estates Housing Project, Cleveland, Ohio.

All in violation of Title 21, United States Code, Section 846.

COUNT 2

The Grand Jury further charges:

On or about August 16, 2005, in the Northern District of Ohio, Eastern Division, JERMAINE LEE, aka SMURF, aka J, and ABDUL GLOVER, aka ABDUL, did knowingly and intentionally distribute approximately 1.32 grams of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II narcotic drug controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C) and Title 18, United States Code, Section 2.

COUNT 3

The Grand Jury further charges:

On or about August 17, 2005, in the Northern District of Ohio, Eastern Division, TREVOR CAMPBELL, aka BLACK, and others known and unknown to the Grand Jury, did knowingly and intentionally distribute approximately 7.97 grams of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II narcotic drug controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B) and Title 18, United States Code, Section 2.

COUNT 4

The Grand Jury further charges:

On or about August 19, 2005, in the Northern District of Ohio, Eastern Division, CHRISTOPHER WILEY, aka WILEY, aka PEE,

and others known and unknown to the Grand Jury, did knowingly and intentionally distribute approximately 2.79 grams of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II narcotic drug controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C) and Title 18, United States Code, Section 2.

COUNT 5

The Grand Jury further charges:

On or about August 24, 2005, in the Northern District of Ohio, Eastern Division, BRANDON GEER, aka TYSON, and MICHAEL MAY, aka DIESEL, aka D, did knowingly and intentionally distribute approximately 2.89 grams of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II narcotic drug controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C) and Title 18, United States Code, Section 2.

COUNT 6

The Grand Jury further charges:

On or about August 30, 2005, in the Northern District of Ohio, Eastern Division, ANTHONY WILSON, aka ANTHONY EVANS, aka PAULY, did knowingly possess a firearm in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit: conspiracy to possess with the intent to distribute and the distribution of cocaine base ("crack") as charged in Count 1 of this indictment, a violation of Title 21,

United States Code, Sections 841(a)(1) and (b)(1)(A); in violation of Title 18, Section 924(c), United States Code.

COUNT 7

The Grand Jury further charges:

On or about October 11, 2005, in the Northern District of Ohio, Eastern Division, MUHAMMED DYE, aka RED, did knowingly and intentionally distribute approximately 6.70 grams of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II narcotic drug controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

COUNT 8

The Grand Jury further charges:

On or about October 20, 2005, in the Northern District of Ohio, Eastern Division, CHRISTOPHER ELLIOT, aka CANNON, aka CAN, did knowingly and intentionally distribute approximately 5.19 grams of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II narcotic drug controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

COUNT 9

The Grand Jury further charges:

On or about October 21, 2005, in the Northern District of Ohio, Eastern Division, KEVIN BALLARD, aka KEV, and HAROLD CAMERON, aka TY, did knowingly and intentionally distribute approximately 9.16 grams of a mixture or substance containing a

detectable amount of cocaine base ("crack"), a Schedule II narcotic drug controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B) and Title 18, United States Code, Section 2.

COUNT 10

The Grand Jury further charges:

On or about October 25, 2005, in the Northern District of Ohio, Eastern Division, KEVIN BALLARD, aka KEV, and HAROLD CAMERON, aka TY, did knowingly and intentionally distribute approximately 11.79 grams of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II narcotic drug controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B) and Title 18, United States Code, Section 2.

COUNT 11

The Grand Jury further charges:

On or about October 26, 2005, in the Northern District of Ohio, Eastern Division, KEVIN BALLARD, aka KEV, did knowingly and intentionally distribute approximately 11.93 grams of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II narcotic drug controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

COUNT 12

The Grand Jury further charges:

On or about October 31, 2005, in the Northern District of Ohio, Eastern Division, CHRISTOPHER ELLIOT, aka CANNON, aka CAN, and ANTHONY KARBAN, aka TONE, did knowingly and intentionally distribute approximately 8.20 grams of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II narcotic drug controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B) and Title 18, United States Code, Section 2.

COUNT 13

The Grand Jury further charges:

On or about November 3, 2005, in the Northern District of Ohio, Eastern Division, ANTHONY KARBAN, aka TONE, did knowingly and intentionally distribute approximately 9.25 grams of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II narcotic drug controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

COUNT 14

The Grand Jury further charges:

On or about November 7, 2005, in the Northern District of Ohio, Eastern Division, CHRISTOPHER WILEY, aka WILEY, aka PEE, did knowingly and intentionally distribute approximately 12.10 grams of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II narcotic drug controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

COUNT 15

The Grand Jury further charges:

On or about November 8, 2005, in the Northern District of Ohio, Eastern Division, KALEEF REED, aka KBURPO, aka KHALEEF REID, aka K, and OMAR WILSON, aka OMAR, aka O, did knowingly and intentionally distribute approximately 2.62 grams of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II narcotic drug controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C) and Title 18, United States Code, Section 2.

COUNT 16

The Grand Jury further charges:

On or about November 8, 2005, in the Northern District of Ohio, Eastern Division, OMAR WILSON, aka OMAR, aka O, and KALEEF REED, aka KBURPO, aka KHALEEF REID, aka K, did knowingly and intentionally distribute approximately 3.96 grams of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II narcotic drug controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C) and Title 18, United States Code, Section 2.

COUNT 17

The Grand Jury further charges:

On or about November 16, 2005, in the Northern District of Ohio, Eastern Division, ABDUL GLOVER, aka ABDUL, did knowingly and intentionally distribute approximately 1.66 grams of a mixture or substance containing a detectable amount of cocaine

base ("crack"), a Schedule II narcotic drug controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 18

The Grand Jury further charges:

On or about November 23, 2005, in the Northern District of Ohio, Eastern Division, KEVIN DANIELS, aka KILLER KEV, and ANTHONY WILSON, aka ANTHONY EVANS, aka PAULY, did knowingly and intentionally distribute approximately 10.17 grams of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II narcotic drug controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B), and Title 18, United States Code, Section 2.

COUNT 19

The Grand Jury further charges:

On or about November 23, 2005, in the Northern District of Ohio, Eastern Division, MARCYL KELLY, as an owner, lessee, occupant, mortgagee and agent of a building, room, and enclosure, namely 2370 East 30th Street, Cedar Estates Housing Project, Cleveland, Ohio, did knowingly and intentionally rent, lease, profit from and otherwise make available for use, with or without compensation, said building, room and enclosure for the purpose of unlawfully manufacturing, storing, distributing and using a controlled substance, namely cocaine base ("crack"), a Schedule II narcotic drug controlled substance; in violation of Title 21, United States Code, Section 856(a)(2).

COUNT 20

The Grand Jury further charges:

On or about November 29, 2005, in the Northern District of Ohio, Eastern Division, ANTHONY WILSON, aka ANTHONY EVANS, aka PAULY, did knowingly and intentionally distribute approximately 22.19 grams of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II narcotic drug controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

COUNT 21

The Grand Jury further charges:

On or about November 29, 2005, in the Northern District of Ohio, Eastern Division, MARCYL KELLY, as an owner, lessee, occupant, mortgagee and agent of a building, room, and enclosure, namely 2370 East 30th Street, Cedar Estates Housing Project, Cleveland, Ohio, did knowingly and intentionally rent, lease, profit from and otherwise make available for use, with or without compensation, said building, room and enclosure for the purpose of unlawfully manufacturing, storing, distributing and using a controlled substance, namely cocaine base ("crack"), a Schedule II narcotic drug controlled substance; in violation of Title 21, United States Code, Section 856(a)(2).

COUNT 22

The Grand Jury further charges:

On or about November 30, 2005, in the Northern District of Ohio, Eastern Division, JAMES BRASWELL, aka JAY, aka TONE, did

knowingly and intentionally distribute approximately 1.49 grams of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II narcotic drug controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 23

The Grand Jury further charges:

On or about December 1, 2005, in the Northern District of Ohio, Eastern Division, CORDALE DANIELS, aka MC, did knowingly distribute approximately 1.01 grams of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II narcotic drug controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 24

The Grand Jury further charges:

On or about December 2, 2005, in the Northern District of Ohio, Eastern Division, KEVIN BALLARD, aka KEV, and CORDALE DANIELS, aka MC, did knowingly and intentionally distribute approximately 9.75 grams of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II narcotic drug controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B) and Title 18, United States Code, Section 2.

COUNT 25

The Grand Jury further charges:

On or about December 13, 2005, in the Northern District of Ohio, Eastern Division, JAMES BRASWELL, aka JAY, aka TONE, did knowingly and intentionally distribute approximately 12.74 grams of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II narcotic drug controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

COUNT 26

The Grand Jury further charges:

On or about December 13, 2005, in the Northern District of Ohio, Eastern Division, KEVIN DANIELS, aka KILLER KEV, JEFFREY LEE, aka BIG JEFF, and JERMAINE LEE, aka SMURF, aka J, did knowingly and intentionally distribute approximately 6.80 grams of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II narcotic drug controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B) and Title 18, United States Code, Section 2.

COUNT 27

The Grand Jury further charges:

On or about December 15, 2005, in the Northern District of Ohio, Eastern Division, JEFFREY LEE, aka BIG JEFF, did knowingly and intentionally distribute approximately 9.49 grams of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II narcotic drug controlled

substance; in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

COUNT 28

The Grand Jury further charges:

On or about December 16, 2005, in the Northern District of Ohio, Eastern Division, JEFFREY LEE, aka BIG JEFF, and JERMAINE LEE, aka SMURF, aka J, did knowingly and intentionally distribute approximately 12.42 grams of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II narcotic drug controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B) and Title 18, United States Code, Section 2.

COUNT 29

The Grand Jury further charges:

On or about December 29, 2005, in the Northern District of Ohio, Eastern Division, LAMONT HEARD, aka BIG HEARD, aka BILL, and CORDALE DANIELS, aka MC, did knowingly and intentionally distribute approximately 7.23 grams of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II narcotic drug controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B) and Title 18, United States Code, Section 2.

COUNT 30

The Grand Jury further charges:

On or about January 5, 2006, in the Northern District of Ohio, Eastern Division, MUHAMMED DYE, aka RED, did knowingly and

intentionally distribute approximately 32.87 grams of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II narcotic drug controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

COUNT 31

The Grand Jury further charges:

On or about January 9, 2006, in the Northern District of Ohio, Eastern Division, MUHAMMED DYE, aka RED, did knowingly and intentionally distribute approximately 6.15 grams of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II narcotic drug controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

COUNT 32

The Grand Jury further charges:

On or about January 25, 2006, in the Northern District of Ohio, Eastern Division, LASHAWN MONCRIEF, aka SHAWN, and others known and unknown to the Grand Jury, did knowingly and intentionally possess with the intent to distribute 16.43 grams of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II narcotic drug controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

COUNT 33

The Grand Jury further charges:

On or about February 13, 2006, in the Northern District of Ohio, Eastern Division, JEREMIAH JACKSON, aka MEYER LANSKY, aka EL, did knowingly and intentionally distribute approximately 0.48 grams of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II narcotic drug controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 34

The Grand Jury further charges:

On or about February 14, 2006, in the Northern District of Ohio, Eastern Division, PERRY AUSTIN, aka TWIN, and RAYMOND HARRIS, aka HAZE, did knowingly and intentionally distribute approximately 0.63 grams of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II narcotic drug controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C) and Title 18, United States Code, Section 2.

COUNT 35

The Grand Jury further charges:

On or about February 15, 2006, in the Northern District of Ohio, Eastern Division, DARNELL NESBIT, aka DNASTY, aka D, did knowingly and intentionally distribute approximately 3.68 grams of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II narcotic drug controlled

substance; in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 36

The Grand Jury further charges:

On or about February 23, 2006, in the Northern District of Ohio, Eastern Division, JEREMIAH JACKSON, aka MEYER LANSKY, aka EL, did knowingly and intentionally distribute approximately 2.76 grams of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II narcotic drug controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 37

The Grand Jury further charges:

On or about March 2, 2006, in the Northern District of Ohio, Eastern Division, DARNELL NESBIT, aka DNASTY, aka D, did knowingly and intentionally distribute approximately 2.60 grams of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II narcotic drug controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 38

The Grand Jury further charges:

On or about March 2, 2006, in the Northern District of Ohio, Eastern Division, KENNETH AGEE, aka BHEAD, MUHAMMED DYE, aka RED, and LAMONT HEARD, aka BIG HEARD, aka BILL, did knowingly and intentionally distribute approximately 8.21 grams

of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II narcotic drug controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B) and Title 18, United States Code, Section 2.

COUNT 39

The Grand Jury further charges:

On or about March 15, 2006, in the Northern District of Ohio, Eastern Division, RAYMOND HARRIS, aka HAZE, did knowingly and intentionally distribute approximately 3.10 grams of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II narcotic drug controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 40

The Grand Jury further charges:

On or about March 24, 2006, in the Northern District of Ohio, Eastern Division, RAYMOND HARRIS, aka HAZE, did knowingly and intentionally distribute approximately 5.60 grams of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II narcotic drug controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

COUNT 41

The Grand Jury further charges:

On or about March 27, 2006, in the Northern District of Ohio, Eastern Division, JEREMIAH JACKSON, aka MEYER LANSKY, aka EL, did knowingly and intentionally distribute approximately 5.98 grams of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II narcotic drug controlled substance; in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

COUNT 42

The Grand Jury further charges:

On or about April 11, 2006, in the Northern District of Ohio, Eastern Division, KEVIN DANIELS, aka KILLER KEV, did knowingly and intentionally distribute approximately 0.65 grams of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II narcotic drug controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 43

The Grand Jury further charges:

On or about April 27, 2006, in the Northern District of Ohio, Eastern Division, DARNELL NESBIT, aka DNASTY, aka D, did knowingly and intentionally distribute approximately 1.46 grams of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II narcotic drug controlled

substance; in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 44

The Grand Jury further charges:

On or about May 5, 2006, in the Northern District of Ohio, Eastern Division, LEONARD MONCRIEF, aka BOOMER, and others known and unknown to the Grand Jury, did knowingly and intentionally distribute approximately 1.14 grams of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II narcotic drug controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C) and Title 18, United States Code, Section 2.

COUNT 45

The Grand Jury further charges:

On or about May 9, 2006, in the Northern District of Ohio, Eastern Division, HAROLD CAMERON, and TY, and MUHAMMED DYE, aka RED, did knowingly and intentionally distribute approximately 16.79 grams of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II narcotic drug controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B) and Title 18, United States Code, Section 2.

COUNT 46

The Grand Jury further charges:

On or about May 9, 2006, in the Northern District of Ohio, Eastern Division, TORRENCE GILLIS, aka TCHEESY, did knowingly

and intentionally possess with the intent to distribute approximately 4.12 grams of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II narcotic drug controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 47

The Grand Jury further charges:

On or about May 9, 2005, in the Northern District of Ohio, Eastern Division, PERRY AUSTIN, aka TWIN, did knowingly and intentionally possess with the intent to distribute approximately 2.28 grams of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II narcotic drug controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 48

The Grand Jury further charges:

On or about May 9, 2005, in the Northern District of Ohio, Eastern Division, PERRY AUSTIN, aka TWIN, did knowingly and intentionally distribute approximately 0.14 grams of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II narcotic drug controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 49

The Grand Jury further charges:

On or about May 12, 2006, in the Northern District of Ohio, Eastern Division, JAMES BRASWELL, aka JAY, aka TONE, did knowingly and intentionally distribute approximately 503.11 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II narcotic drug controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

SPECIFICATION TO COUNTS 1-5; 7-24; 26-48

The Grand Jury specifies:

Between May 2005 through June 2006, in the Northern District of Ohio, Eastern Division, the defendants, MUHAMMED DYE, aka RED, KENNETH AGEE, aka BHEAD, PERRY AUSTIN, aka TWIN, KEVIN BALLARD, aka KEV, JAMES BRASWELL, aka JAY, aka TONE, HAROLD CAMERON, aka TY, TREVOR CAMPBELL, aka BLACK, CORDELL DANIELS, aka MC, KEVIN DANIELS, aka KILLER KEV, CHRISTOPHER ELLIOT, aka CANNON, aka CAN, BRANDON GEER, aka TYSON, TORRENCE GILLIS, aka TCHEESY, ABDUL GLOVER, aka ABDUL, RAYMOND HARRIS, aka HAZE, LAMONT HEARD, aka BIG HEARD, aka BILL, JEREMIAH JACKSON, aka MEYER LANSKY, aka EL, ANTHONY KARBAN, aka TONE, JEFFREY LEE, aka BIG JEFF, JERMAINE LEE, aka SMURF, aka J, MARCYL KELLY, MICHAEL MAY, aka DIESEL, aka D, LASHAWN MONCRIEF, aka SHAWN, LEONARD MONCRIEF, aka BOOMER, DARNELL NESBIT, aka DNASTY, aka D, KALEEF REED, aka KBURPO, aka KHALEEF REID, aka K, CHRISTOPHER WILEY, aka WILEY, aka PEE, ANTHONY WILSON, aka ANTHONY EVANS, aka PAULY, and OMAR WILSON, aka OMAR, aka O, knowingly and intentionally conspired to distribute and possess

with intent to distribute; distributed; and possessed with intent to distribute, quantities of cocaine base ("crack") as individually identified in Counts 1-5; 7-24; 26-48 of this Indictment, a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 846, on and within 1,000 feet of the real property comprising the Cuyahoga Community College, a public college; Marion Sterling Elementary School and Jane Adams High School, each a public school; and the Cedar Estates Public Housing Community; all in violation of Title 21, United States Code, Sections 841(a)(1) and 860(a).

SPECIFICATION TO COUNT 3

The Grand Jury further specifies:

On or about August 17, 2005, in the Northern District of Ohio, Eastern Division, TREVOR CAMPBELL, aka BLACK, being a person at least 21 years of age, knowingly and intentionally, employed, hired, used, persuaded, induced, enticed, and coerced persons under 18 years of age to distribute and possess with intent to distribute 7.97 grams of cocaine base ("crack"), a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B) and 846, on and within 1,000 feet of the real property comprising the Cuyahoga Community College, a public college; Marion Sterling Elementary School and Jane Adams High School, each a public school; and the Cedar Estates Public Housing

Community; all in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B) and 860(a) and (c).

SPECIFICATION TO COUNT 4

The Grand Jury further specifies:

On or about August 19, 2005, in the Northern District of Ohio, Eastern Division, CHRISTOPHER WILEY, aka WILEY, aka PEE, being a person at least 21 years of age, knowingly and intentionally, employed, hired, used, persuaded, induced, enticed, and coerced persons under 18 years of age to distribute and possess with intent to distribute 2.79 grams cocaine base "crack," a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C) and 846, on and within 1,000 feet of the real property comprising the Cuyahoga Community College, a public college; Marion Sterling Elementary School and Jane Adams High School, each a public school; and the Cedar Estates Public Housing Community; all in violation of Title 21,

United States Code, Sections 841(a)(1) and (b)(1)(C) and 860(a) and (c).

A TRUE BILL.

Original Document- Signatures on file with the Clerk of Courts
pursuant to the E. Government Act of 2002.

United States v. Muhammed Dye, aka Red, et. al.

A TRUE BILL.

Foreperson

GREGORY A. WHITE
United States Attorney